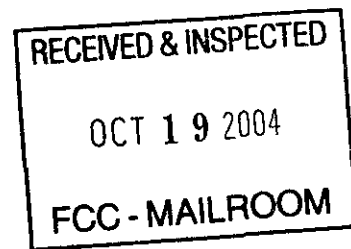


October 18, 2004

DOCKET FILE COPY ORIGINAL



Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby - TW - A325
Washington, D.C. 20554

Re: Petitioner's Reply Comments
Center, Texas (MB Docket No. 04-317)

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of
Petitioner's Reply Comments for Channel 248A at Center,
Texas.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles Crawford", written over a horizontal line.

Charles Crawford
4553 Bordeaux Ave.
Dallas, Texas 75205
(214) 520-7077 Tele

Center Reply Com

No. of Copies rec'd 014
List ABCDE

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OCT 19 2004
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To: John Karousos, Assistant Chief
Audio Division of the
Media Bureau

Logansport Broadcasting, filed a counterproposal in the above captioned proceeding proposing to allot Channel 248A at Logansport, Louisiana, in lieu of the originally proposed Channel 248A at Center, Texas. An essential element of the Logansport counterproposal is the proposed relocation of the vacant allotment Channel 247C2 at Longview, Texas to a severely site restricted set of reference coordinates. Actually, under the Logansport Broadcasting proposal, the new reference coordinates for 247C2 at Longview are also its only possible coordinates, one second of either longitude or latitude will short space the vacant allotment. (See, Exhibit A) Therefore, the area to fully space Channel 247C2 is a rectangle approximately 25.5 meters by 29.4 meters. A site restriction for a C2

vacant allotment which is this extreme is neither practical nor in the public interest.

The Commission requires the reasonable expectation that a useable site is available complying with the minimum spacing requirements.¹ Based on the 2000 DeLorme Street Atlas USA, the proposed severely restricted reference coordinates for the vacant allotment 247C2 are in a residential neighborhood, 10.875 meters from the east side of South Point Road, and according to my estimates, in the living room of a residential home.² (See, Exhibit B) Using the inherent tolerance in the Commission's rounding of coordinates to the nearest second, and moving the coordinates as far east as is possible and still be fully spaced, the 150 meter C2 tower will still be 35.575 meters from the east side of South Point Road. At best, this will restrict the C2 vacant allotment to a 150 meter self supporting tower in order to be fully spaced. Furthermore, it appears that the 25.5 by 29.4 meter rectangle to fully space Channel 247C2 is either in or close to a residential home.³ (See, Exhibit C)

¹ San Clemente, California, 3 FCC rcd 6728 (1988), appeal dismissed sub. Non. Mount Wilson FM Broadcasters, Inc. V. FCC, 884 F2d 1962 (D.C. Cir. 1989)

² Using the 2000 DeLorme Street Atlas USA and converting the NAD 27 Coordinates 32 27 46/ 94 58 32 to NAD 83 coordinates: 32 25 46.52940/ 94 58 53.78382. The road easement is assumed to be 10 meters on either side of the center of the road.

The Commission requires a proposed transmitter site to be both suitable and available. See Grand View, Idaho, 15 FCC Rcd 2768 (2000); Cusseta, Georgia, 6 FCC Rcd 7437 (1991). It appears that the severely site restricted transmitter site proposed by Logansport Broadcasting is not suitable and possibly not available. Therefore, the Logansport Broadcasting Counterproposal should be denied and the proposed Channel 248A at Center, Texas, granted.

Should the Commission decide to allot Channel 248A at Center, Texas, Petitioner will apply for Channel 248A at Center, Texas and after it is authorized, will promptly construct the new facility.

The factual information provided in these Reply Comments is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Charles Crawford', written over a horizontal line.

Charles Crawford
4553 Bordeaux Ave.
Dallas, Texas 75205
(214) 520-7077 Tele

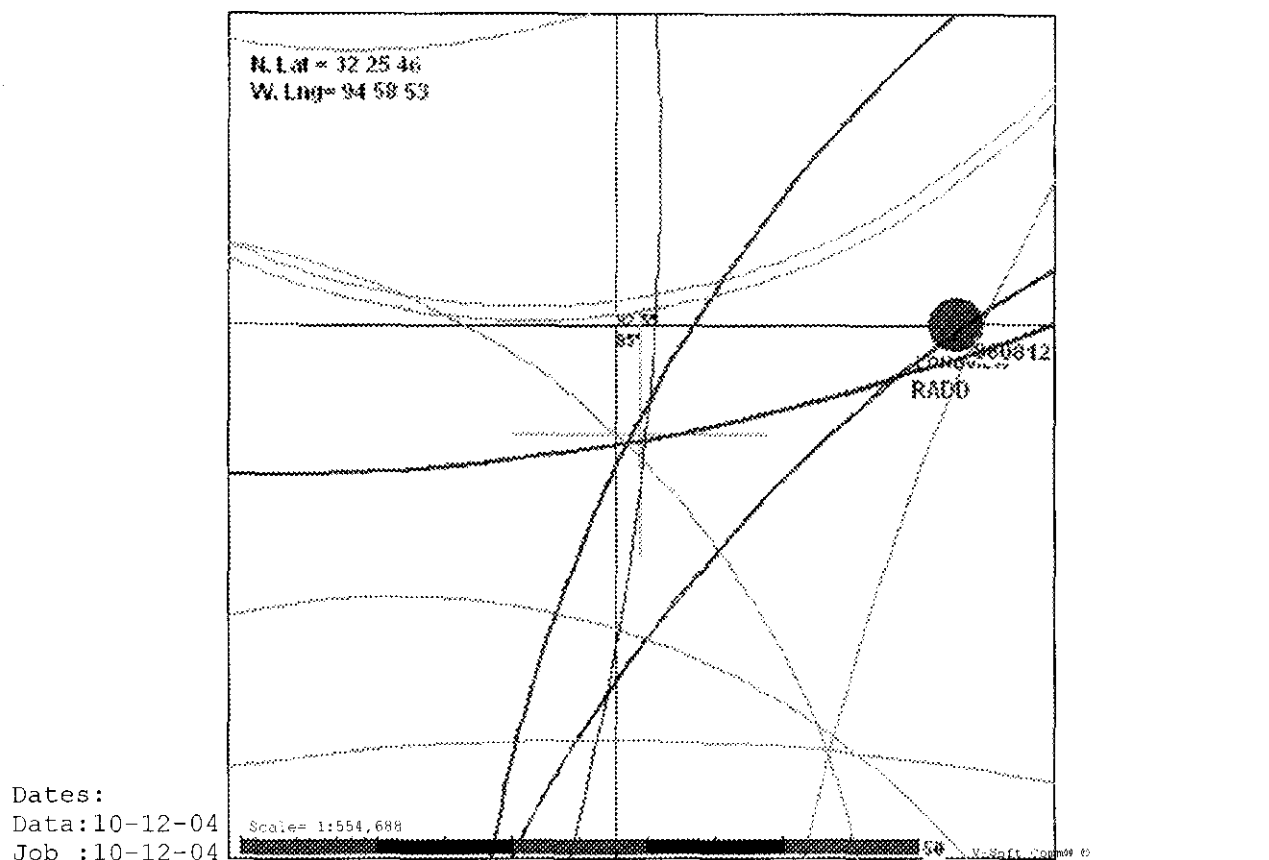
cc: Gene A. Bechtel, Law Office of Gene Bechtel, Suite 600, 1050 17th Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for Charles Crawford. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as Charles Crawford.

October 18, 2004

Exhibit A

(Channel Study for Channel 247C2/ Longview, Texas)

FM PROSP^(TM) LOCATE STUDY CH 247 C2 97.3 MHz



Dates:

Data:10-12-04

Job :10-12-04

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	247C2	ADD	Longview	TX	19.19	78.0	190.0	-170.81
RDEL	247C2	DEL	Longview	TX	24.32	73.4	190.0	-165.68
880812	247C2	VAC	Longview	TX	24.32	73.4	190.0	-165.68
RADD	248A	ADD	Logansport	LA	105.50	117.8	106.0	-0.50
RADD	247A	ADD	Fort Towson	OK	165.51	350.0	166.0	-0.49
KEGL	246C	LIC N	Fort Worth	TX	187.52	276.0	188.0	-0.48
KOYE	244C2	LIC N	Frankston	TX	59.23	223.1	58.0	1.23
KSCN	245C3	LIC N	Pittsburg	TX	64.77	352.6	56.0	8.77
KSCN.C	245A	CP	Pittsburg	TX	64.77	352.6	55.0	9.77
RADD	248A	ADD	Center	TX	115.86	133.1	106.0	9.86
RADD	248A	ADD	Center	TX	115.94	133.1	106.0	9.94
KWRW	249C3	LIC N	Rusk	TX	69.93	194.9	56.0	13.93
KDBHFM	247C3	LIC	Natchitoches	LA	197.27	110.1	177.0	20.27
KTHT	246C	LIC	Cleveland	TX	210.07	180.9	188.0	22.07
KALK	249C3	LIC N	Winfield	TX	86.31	345.8	56.0	30.31
RADD	248C2	ADD	Tom Bean	TX	186.23	309.3	130.0	56.23
KWTXFC	248C*	CP	Waco	TX	251.38	241.7	188.0	63.38
KWTXFM	248C	LIC	Waco	TX	251.42	241.7	188.0	63.42
RDEL	248C2	DEL	Durant	OK	195.56	316.3	130.0	65.56
RDEL	248C2	DEL	Durant	OK	195.56	316.3	130.0	65.56
KLAK	248C2	LIC	Durant	OK	195.56	316.3	130.0	65.56
RADD	248C	ADD	Keller	TX	259.42	296.3	188.0	71.42
RADD	248C	ADD	Keller	TX	259.42	296.3	188.0	71.42

Exhibit B

(Location for the vacant allotment, 247C2 at Longview,
Texas)

Longview, TX CH 247C2

ST. POINT RD

WEST POINT RD

SOUTH POINT RD

N32° 25.775'
W94° 58.896'

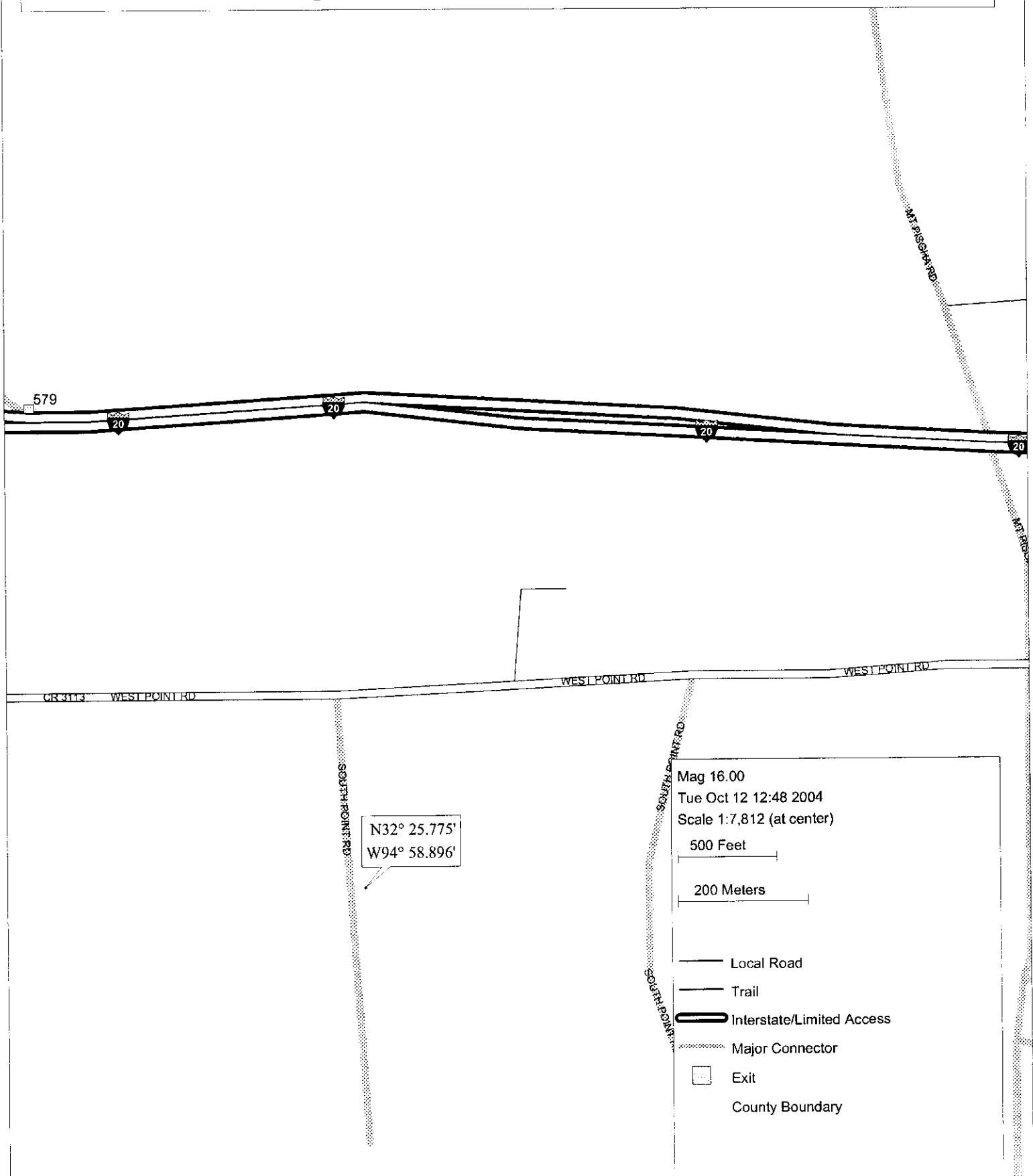
Mag 18.00
Tue Oct 12 12:46 2004
Scale 1:1,953 (at center)

200 Feet

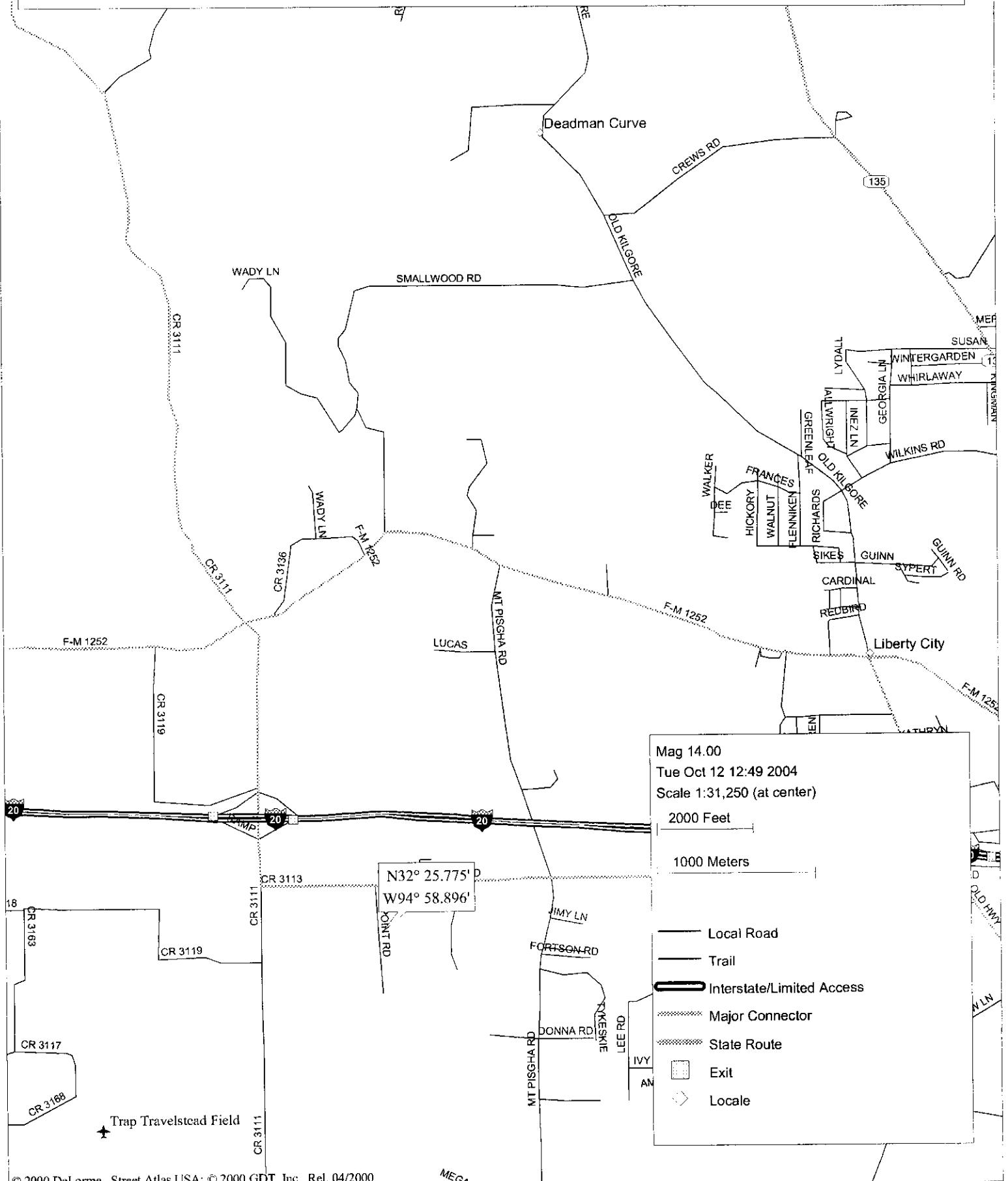
50 Meters

— Local Road
— Trail
----- Major Connector

Longview, TX CH 247C2



Longview, TX CH 247C2



Longview, TX CH 247C2

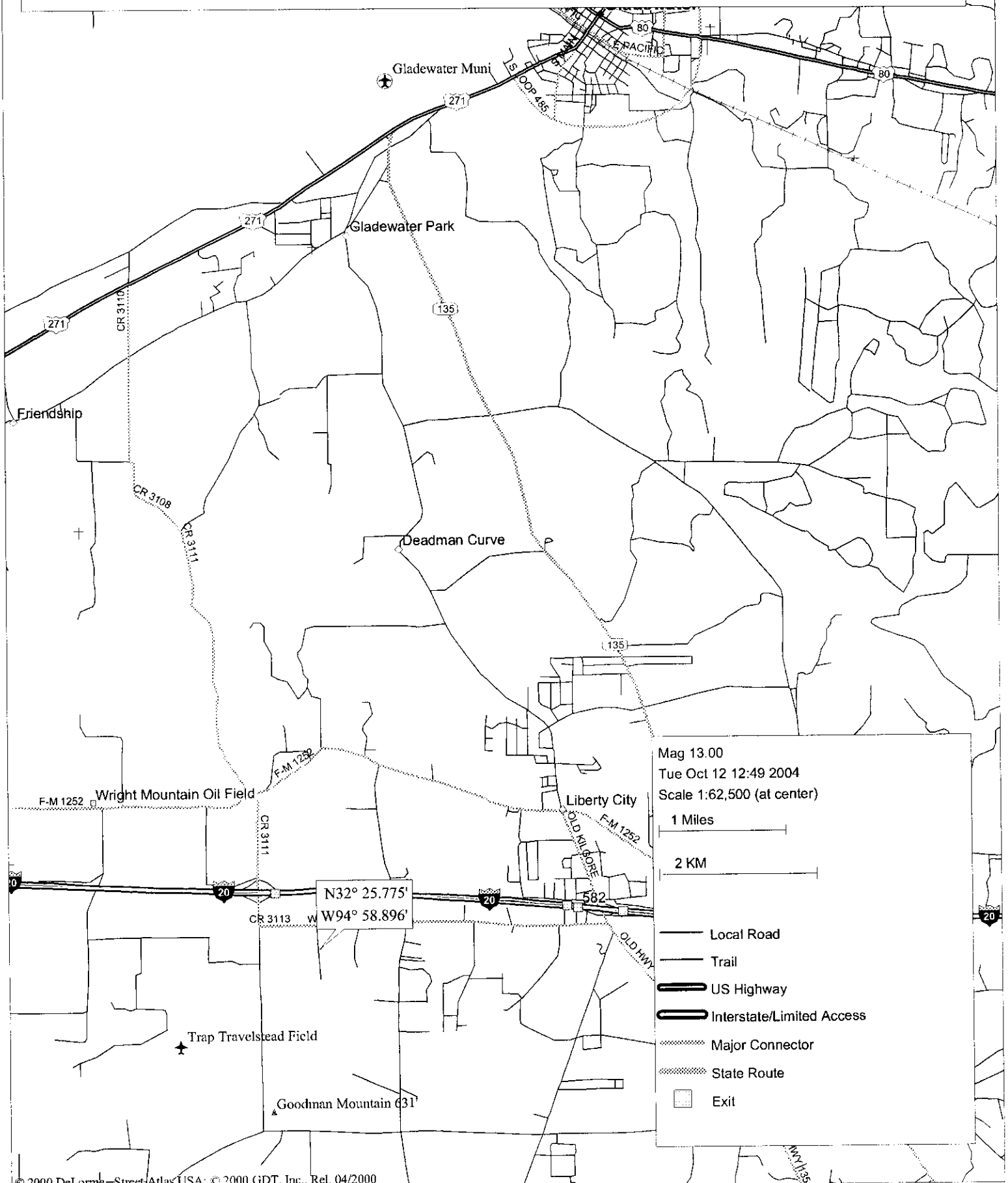


Exhibit C

(Location of the proposed new reference coordinates for
Channel 247C2 at Longview, Texas)

CR 3765
SOUTHPOINT RD



32 25 46
94 58 53



32 25 46
94 58 53



CERTIFICATE OF SERVICE

I, Charles Crawford, do hereby certify that I have on this 18th day of October, 2004 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Reply Comments" to the following:

Sharon P. McDonald
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby - TW - A325
Washington, DC 20554

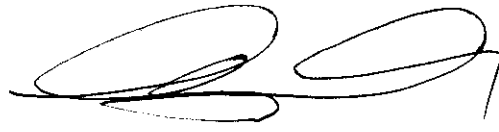
Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street Lobby - TW - A325
Washington, D.C. 20554

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Washington, D.C. 20036
(Counsel for Charles Crawford)

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(Counsel for Logansport Broadcasting)

Anna M. Canterbury
Noalmark Broadcasting Corporation
202 West 19th Street
El Dorado, AR 71730

A handwritten signature in black ink, appearing to read 'Charles Crawford', written over a horizontal line.

Charles Crawford